UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS (CENTRAL DIVISION)

LEASE AMERICA.ORG, INC.,)
Plaintiff,)
V.) Civil Action No. 4:13-CV-40015-TSH
ROWE INTERNATIONAL CORPORATION; AMI ENTERTAINMENT NETWORK, INC.; AMUSEMENT AND MUSIC OPERATORS ASSOCIATION, INC.; DOE DEFENDANTS 1-10,))))
Defendants.)))

AMI DEFENDANTS' MOTION TO TRANSFER VENUE AND CONDITIONAL REQUEST FOR LIMITED DISCOVERY AND EVIDENTIARY HEARING

Defendant AMI Entertainment Network, Inc. ("AMI") respectfully moves on behalf of itself and as successor to Rowe International Corporation ("Rowe") to transfer this action to the U.S. District Court for the Western District of Michigan pursuant to 28 U.S.C. 1404(a). In support of this motion, AMI submits the accompanying memorandum of law. For the reasons stated therein, AMI requests that this Court order immediate transfer of the entire action, including any and all pending motions.

AMI submits that the documents and declarations submitted herewith establish that AMI is entitled to the relief sought. If, however, the Court determines that it needs additional evidence to make a definitive ruling, AMI respectfully requests leave to take limited discovery related solely to the disputed contractual issues and an evidentiary hearing on its motion.

May 2, 2014

Respectfully submitted,

ROWE INTERNATIONAL CORPORATION and AMI ENTERTAINMENT NETWORK, INC.

/s/ David Viens

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Pursuant to Local Rule 7.1(A)(2), I certify that counsel for AMI and Rowe have conferred in good faith with counsel for Defendant AMOA and counsel for Plaintiff. Defendant AMOA takes no position on this motion. Plaintiff and AMI were unable to resolve or narrow the issues that are the subject of this motion.

/s/ David Viens
David Viens

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 5.4(C) a copy of the foregoing document was served electronically on all counsel of record via the Court's ECF system on May 2, 2014.

/s/ David Viens
David Viens